

***PELUSO & TOUGER, LLP***  
**70 LAFAYETTE STREET**  
**NEW YORK, NEW YORK 10013**  
**PelusoandTouger.com**

**Ph. No. (212) 608-1234**

**Fax No. (212) 513-1989**

BY ECF:  
September 14, 2021

Honorable Loretta A. Preska  
United States District Court Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: United States v. Albert Lucas,  
19 Cr 291 (LAP)


Your Honor,

I represent Albert Lucas in the above captioned matter. In the superseding indictment filed on September 9, 2021, he is charged in two counts: Count One, Conspiracy to Commit Wire Fraud and Count Two Conspiracy to commit Money Laundering. Mr. Lucas has not been arraigned on the indictment and intends to plead not guilty.

The Court has directed that the defense submit Motions in Limine today. I write to request that the Court permit me to join the motions filed by on behalf of co-defendant Abiola Olajumoke by his attorney Joshua Dratel, Esq. and the motion filed by Richard Rosenberg on behalf of Oluwaseun Adelekan seeking an adjournment of the trial date based on the lack of a fair cross section of individuals in the jury pool.

Thank you very much for your consideration of this matter.

Respectfully yours,



David Touger

SO ORDERED.

 9/17/2021